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10 **IN THE UNITED STATES BANKRUPTCY COURT
11 FOR THE DISTRICT OF NEVADA**

12 In re:
13 INFINITY CAPITAL MANAGEMENT, INC.
14 Debtor.

15 Case No.: 21-14486-abl
16 Chapter 7

17 **DECLARATION OF CHAD MEYER IN
18 SUPPORT OF TECUMSEH'S MOTION
19 TO ALLOW AMENDMENT OF
20 DECLARATION [ECF NO. 59]**

21 Date: OST REQUESTED
22 Time: OST REQUESTED

23 I, Chad Meyer, pursuant to 28 U.S.C. § 1746, declare as follows:

24 1. My name is Chad Meyer. I am over the age of twenty one years, of sound mind,
25 and fully competent to testify in this cause. I have personal knowledge of the facts stated herein,
26 all of which are true and correct.

27 2. I am a principal of party in interest Tecumseh–Infinity Medical Receivable Fund,
28 LP, (“**Tecumseh**”). I submit this declaration in support of Tecumseh’s *Motion to Allow
Amendment of Declaration [ECF No. 59]* (the “**Motion**”). In that capacity, I have personal
knowledge of the matters set forth herein. If called upon to testify as to the matters herein, I could
and would do so.

1 3. Earlier in this case, I executed a *Declaration in Support of Motion of Party in*
2 *Interest Tecumseh-Infinity Medical Receivables Fund, LP to (1) Abandon Property and (2) Lift the*
3 *Automatic Stay [ECF No. 59]* (the “**Declaration**”). I intended Exhibit A to the Declaration to be
4 a printout of a spreadsheet, TIFDumpWithIncomeFinal.xlsx, provided by the Debtor. As I
5 testified, that spreadsheet contained a list of 8,185 receivables with a total face value of
6 \$26,723,966.92. See Declaration, ¶ 9. I intended for Exhibit A to be a complete copy of the
7 spreadsheet, TIFDumpWithIncomeFinal.xlsx, listing all 8,185 receivables.

8 4. I intended Exhibit B to be a printout of a second spreadsheet
9 provided by the Debtor, ESDVerifiedHASOverlapDumpWithIncome.xlsx. As I testified, that
10 spreadsheet contained a list of additional receivables claimed by Tecumseh consisting of 485
11 receivables with a total face amount \$1,321,907.04. *See Declaration, ¶ 10.* I intended for Exhibit
12 B to be a complete copy of the spreadsheet, ESDVerifiedHASOverlapDumpWithIncome.xlsx,
13 listing all 485 receivables.

14 5. Attached hereto as Exhibit A and Exhibit B are the true and correct copies of the
15 intended attachments to my Declaration.

16 I declare under the penalty of perjury of the laws of the United States of America that the
17 foregoing is true and correct.

18 Dated February 3, 2022

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Chad Meyer